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ALPHAPALS, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

KAY CADY-JOHNSON,

Plaintiff,

vs.

ALPHAPALS, INC.,

Defendant.

Case No.: 4:24-cv-06213-HSG

**STIPULATION AND ORDER
FOR EXTENSION OF
DEADLINES (as modified)**

Pursuant to Civil Local Rule 6-2, plaintiff Kay Cady-Johnson (“Plaintiff”) and defendant Alphapals, Inc. (“Defendant”) (collectively, the “Parties”) hereby jointly submit this Stipulation and [Proposed] Order to modify the deadlines set by this Court’s November 15, 2024 Order Granting Stipulation for Extension of Deadlines (ECF No. 26) (hereafter “Scheduling Order”) as follows:

1. On September 3, 2024, Plaintiff filed the instant action against Defendant.

2. The Parties (through undersigned counsel) have been engaged in a dispute before the U.S. Patent & Trademark Office’s Trademark Trial and Appeal Board (the “TTAB”), as Defendant initiated a proceeding to seek cancellation of

1 Plaintiff's trademark.

2 3. On November 14, 2024, the parties stipulated to extend deadlines based
3 on ongoing settlement discussion.

4 4. Since that time, the parties, through counsel, have been in discussions
5 regarding the case, including potential resolution of the case.

6 5. While the discussions have been productive, the holiday season has
7 slowed them down due to limited availability of parties and counsel.

8 6. The discussions are ongoing, and a further extension of deadlines would
9 allow such discussions to continue, very likely resolving this matter without the
10 need to further burden the Court.

11 7. The parties have stipulated that the deadline for Defendant's Response
12 to the Complaint be moved to February 19, 2025 to allow the parties to continue
13 their discussions and attempt to resolve this matter.

14 7. The stipulated extension proposed herein would place the deadline for
15 the Defendant's Response to the Complaint after the first two deadlines listed in
16 the November 15, 2024 Order Granting Stipulation for Extension of Deadlines;
17 therefore, the Parties further agree to extend all deadlines listed on page two of
18 that Order by approximately 60 days, as set forth in the following table, or as the
19 Court deems proper:

20 Event	Deadline
21 Deadline to file ADR Certification	2/21/2025
22 Deadline to meet and confer re: initial disclosures, early 23 settlement, ADR process selection, and discovery plan.	2/21/2025
24 Deadline to make initial disclosures.	3/11/2025
25 Deadline to file Joint Case Management Statement.	3/11/2025
26 Initial Case Management Conference	As scheduled by the Court

1 8. Two previous modifications of the case schedule have been requested by
2 the parties and granted by the Court.

3 9. The requested time modification would minimally impact the current
4 schedule for this case. The Parties have not yet met and conferred regarding the
5 dates to be identified in the Joint Case Management Statement, and the proposed
6 modification extends the timeframe for the requisite preliminary discussions and
7 corresponding submissions by approximately two months.

8 10. Each of the signatories listed below have concurred in the filing of this
9 Stipulation.

10
11 IT IS SO STIPULATED.

12 LEGALFORCE RAPC WOLDWIDE, P.C.

13 By: s/ Derrick M. Davis

14 Andrea K. Gorrie, CA State Bar No. 351177

15 Derrick M. Davis, TN BPR No. 037122

16 *Attorneys for Plaintiff, Kay Cady-Johnson*

17 Dated: December 18, 2024

18 KPPB LLP

19 By: s/ Joel A. Kauth

20 Joel A. Kauth, CA State Bar No. 186544

21 *Attorneys for Defendant Alphapals, Inc.*

22 Dated: December 18, 2024

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED except the**
24 **case management conference will be held on March 18, 2025 at 2:00 p.m.**
25 **The Zoom webinar information and instructions remain the same as**
26 **previously provided in docket no. 26.**

27 Dated: 12/19/2024

28 
Hon. Haywood S. Gilliam, Jr.

United States District Court Judge